

EPA comments on RR Deliverables for Wallace Yard and Spur Lines

August 7, 2009

RADs for Wallace Yard and Hercules Mill

General Comment: Need to show existing roads and other surface features so that you can actually design how the project will interface with them and provide the adequate level of design and associated details. Please do so.

Recall in our meeting in Coeur d'Alene that we had understood the 1st set of RADs for the WY and HM to be of a conceptual nature and that they would need much more detail to be in a final form. It doesn't appear that the more recent set (July 2009) of those RADs are yet in final form but we note that they do include some additional details, but do not fully address the concerns that we had conveyed in our earlier conversations. Some examples of those concerns

- ✓ Flow drainage patterns and surface water structures and elevations thereof (notably some of these features are included). It is not apparent from the drawings where surface water is currently conveyed or how it will be incorporated into the design.
- ✓ Design details such as cross sections of ditches, rock armoring at outfalls, rock armoring at intake structures, top of bank/barrier details are not displayed.
- ✓ Comprehensive site water management is not portrayed and is not described.
- ✓ Over reliance on the SWPPP (Note 2 on G2) to solve all things related to surface water is not appropriate. The SWPPP is intended to address stormwater issues during construction and is viewed as a deliverable by EPA for this project. However, the SWPPP is not intended to incorporate the long-term site water management issues, but rather how you are going to manage stormwater, and prevent erosion during construction. Please incorporate the site water features as noted above and in our previous conversations on this topic. Additional comments related to this topic:
 - Note 3 on G2 states traffic control, site use and work sequencing will be described in the SWPPP. This is inappropriate to defer these necessary plans to the SWPPP. Please submit them and other applicable plans with the revised drawings.
- ✓ Note 5 on G2 is partially responsive to the government's request to protect existing veg, but there should be callouts noting heavier vegetation such as east of the HM foundations, as we commented on previously.
- ✓ Note 6 on G2 calls for disposal off-site. The site in the case of the BHM&M Complex extends along 166 river miles and is upto several miles on either side of the river. The actions taken by the RR are within that site. Off-site needs to be defined and clarified to be clear as to your intent for off-site vs. on-site disposal.
- ✓ Fence needs to completely encircle the foundations at HM to be functional - modify drawing C5 and others where applicable.
- ✓ Contaminated soils on foundations will require removal and disposal at designated repository - callout on drawing C5 and others as appropriate. Sampling will help delineate extent and disposal options.
- ✓ Callout for demolition and disposal needs to identify where disposal will occur.
- ✓ Callout on C6 calls for positive drainage being maintained. This will be able to be designed after you've portrayed site drainage features, characteristics, and grading plan.
- ✓ Additional details needed on C10: examples culvert inlets and barrier interfaces; Culvert inlets and barrier/rock armoring, barrier interface w/ roads, barrier interface with private properties.
- ✓ Detail 4 on C11 fails to account for existing riprap on Streambank and how the bank integrity will be preserved or replaced and how drainage will be conveyed...
- ✓ Drainage issues will be created if existing slopes are not matched and maintained example detail 8 on c12 displays sloping the soil over 72 in which would equal a 6:1 slope, but could result in increased runoff velocities if the adjacent slope is less and thus sets up erosion of barrier. Make every effort to prevent and revise drawings.

- ✓ Need to provide grading plans in the drawings set and display that the constructed grades are going to shed drainage appropriately.
- ✓ Detail on C13 is incorrect. Fence line is at edge of clean barrier, verify your dimensions, location and width of barrier, as well – revise drawings to correct.
- ✓ Display access points and decon station locations and details in drawings.

RADs for Spur Lines

Major issue with these drawings is that they don't capture the RUA actions and then presume that no other remedies are necessary given segments. That is an inaccurate portrayal of the response action and the segments will need to be addressed. If an RUA is conducted at a specific property along a given segment, other remediation may not be required, but the drawings need to display the RUA actions on these RADs. Revise your drawings accordingly, example segment is between NPRY MM 0.4 to > 1.25 in Nine Mile Creek (NMC).

General Comment 1: Width of Barrier on RADs does not but needs to be consistent with the definition of the FROWW in the CD, extend barrier laterally to top of embankment on creekside and to extent of ROW on opposite given use by humans. (example NPRY 0.0 to 0.4 in NMC)

General Comment 2: Need to show existing roads and other features so that you can actually design how the project will interface with them and provide the adequate level of design and associated details. Please incorporate all features necessary to provide a final design to EPA..

Other specific examples of issues that need to be rectified:

- ✓ Need cross section that accurately displays top of bank and how barrier will be placed on embankment to top of bank. (one example segment is as 0.0- 0.4 NMC).
- ✓ Note 2 on C2 and elsewhere calls for disposing of soils on site through spreading. This is not part of the discussion and does not conform with CD. A suitable disposal site is at the repository on site in the Coeur d'Alene Basin that is designated for disposal by EPA. [NOTE BOX REPOSITORY IS NOT AVAILABLE FOR DISPOSAL FROM THE PROJECT - REMOVE ALL LANGUAGE REFERRING TO 'BOX'.
- ✓ Note 4 on C2 and other sheets is not accurate - delete.
- ✓ Add note to all drawings to preserve and protect all existing infrastructure, drainage ways, wells, culverts, intakes, etc.
- ✓ Add to language on Note 1 all drawings - 'and convey surface water runoff'
- ✓ ROW overlaps road and residences. Drawings should display that road shoulder and residential RUAs will be remediated. (examples NPRY mm 0.4 to < 1.25, 0.0 - 0.25, both NMC, etc..
- ✓ Location of tailings bank will be verified, in coordination with EPA (add note). . NPRY mm 1.6
- ✓ Example of road that needs to be located on drawings: E. Fork NMC, approx MM 3.1 where road splits. Remedy details needed - add details for interface.
- ✓ Note 2 calls for spreading contaminated soils - this is not in conformance with CD/SOW.
- ✓ Delete comment #4 sheet C3
- ✓ Termination points of remedies will require field verification as all mm are very approximate and based on very approximate drawings and estimations. Example: Change mm in note on sheet c5 (and others where applicable) to 2.62 for termination point of no remediation - add that termination will be field verified and will be coordinated with EPA.
- ✓ As noted above field verify and coordinate, NPY mm 3.8
- ✓ What property boundaries in note 3 sheet C6 referring to?
- ✓ The governments have presented and provided data to RR of very high (approximately concentrate level) of Pb soils along NPY ~ mm 4.5 to mm 4.7 yet

not mention of made of that information in these drawings. Drawings need to display and provide a response action.

- ✓ NPY mm >5.0 should note that high contaminant levels documentation has been presented and provided by Gov't. Also include note that the RR will perform additional sampling and removal or capping based on such sampling and subject to review and approval of EPA.
- ✓ Another example of features not accurately displayed, Dobson Pass Road should be displayed on drawings NPY mm 4.5 - 5.0
- ✓ Road shoulder remediation needs to extend from 0.0 in CC
- ✓ Drawings do not display a spur line that runs through a RUA that runs to the East from approximate Mm 0.10 WIRR. This segment has been discussed in the past with the RR.
- ✓ Extend gravel road shoulders from MM ~ 0.4 to about 0.85 (NPRY - CC) and display RUAs in drawings.
- ✓ Notes should call out that the embankment in segment of WIRR has been removed by others and that response actions will terminate at approximate MM as verified by field inspection and coordinated with EPA. From MM 0.8 - 3.25??? (Document why there is no action in this segment).
- ✓ Add gravel barrier mm 3.25 to ~3.75, and 4.7 ~ 4.9, 5.0 ~ 5.75 WIRR.
- ✓ Coordinate with BPRP program on Typical Detail for Road Shoulder Ex and Replace. Make detail consistent with what's currently done so that it is responsive to community/county requirements. Revise detail accordingly.
- ✓ Add detail for embankment where it is a causeway or similar situation.
- ✓ Display access points and deacon station locations and details.

PMPS

There a number of missing spec. sections, examples: disposal, decontamination, drainage, rock aprons, etc.

The following are examples of errors needing correction in the Pumps:

- ✓ Delete 'Box' from the Bunker Hill Mining and Metallurgical Site and p2 and all other such references. Box is not part of the facility name. It refers to a geographic area that is a subset of the facility. If you dispose of contaminated soils in a repository that EPA operates, it will not be in the Box.
- ✓ Delete "if used" from last sentence under B3. It will need to be used to provide stability, moisture retention and protection from direct sun.
- ✓ Section A.1 does not refer the contractor or the reviewer to the Appendix A. Is the intent that the appendix would be required? I would hope so, please update spec.
 - What ACP roughness schedule is going to be required? This needs to be in the PMPs.
- ✓ I don't find any subgrade preparation or aggregate base requirements for ACP, please include.
- ✓ Insert a sub-section in section B to ensure that the parking lot is graded to drain and will not result in ponding of surface water on the lot.

RAWP

Here are examples of issues that need to be corrected in the RAWP:

- ✓ In Section 2.3 the language makes it sounds like the response action contractor doesn't have to do anything for permits. Actually CERCLA waiver only waives the procedural requirements. The RRs and their contractors are still required to comply with the substantive requirements of permits. Please correct the language and reference the citation in the NCP.
- ✓ Section 2.3 still defers the ARARs, which is contrary to our conversation in CDA. The ARARS analysis needs to be done before you task your contractor. Perform the ARARs analysis and submit to EPA as a deliverable rather than hold up this document.
 - The listing is less than complete
- Section 4.2 describes on-site spreading of debris. Need to display how the subgrade adequacy will be met. What is the test, how will it be implemented, how will it display engineering adequacy?
- 4.3 – what is “waste material”, it's not defined and it's not clear if this is soils, debris, or both.
- Delete “box” in 4.4
- The WACs included in 4.4 are incomplete; there are size, material, moisture requirements. Insert into this document.
- Section 4.5 the term is hazardous “substances” not materials in second sentence.
- Section 11 – schedule, update project will be implemented at Wallace Yard and HM in 2009. Spur Lines in 2010, as previously discussed.
- Table MM need to match drawings as amended per comments above, with note that the MMs are approximate and actual field conditions will dictate start and termination points for response actions.
- Appx A – this spill prevention plan is inadequate, please provide a comprehensive plan that is complementary to the SPCCP.
